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March 8, 2017

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VIA ECFS
VIA E-MAIL

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, ET Docket No. 13-49

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 1.1206, the Association of Global Automakers, Inc. ("Global Automakers"), by its attorneys, hereby submits this letter summarizing three *ex parte* meetings in the above-referenced docket.

On March 6, 2017, Hanna Izon and Paul Scullion of Global Automakers, Roger Berg of Denso International America, Inc., Sue Bai of American Honda Motor Company, Inc., John Kenney of Toyota (participating by telephone), Steven Bayless of Intelligent Transportation Society of America, Mike Schagrin of Schagrin Consulting International LLC, and Paula Timmons of PaulaTimmons Consulting, along with counsel Scott Delacourt of Wiley Rein LLP, met with Erin McGrath, Legal Advisor, Office of Commissioner Michael O'Rielly and, separately, with Julius Knapp, Geraldine Matise, Howard Griboff, Jamison Prime, Karen Rackley, Patrick Forster, and Rashmi Doshi (participating by telephone), all of the Office of Engineering and Technology ("OET"). On March 7, 2017, the same group met with Daudeline Meme, Legal Advisor, Office of Commissioner Mignon Clyburn. The attached handouts were distributed during the meetings.

The parties discussed Global Automakers' vision for the 5.9 GHz safety spectrum and for the Dedicated Short Range Communications ("DSRC") service; the U.S. Department of Transportation's National Highway Traffic Safety Administration's Notice of Proposed Rulemaking proposing to mandate Vehicle-to-Vehicle ("V2V") communications for new light vehicles and to standardize the message and format of V2V transmissions; and the status of the FCC's testing of Wi-Fi sharing devices and anticipated next steps. Global Automakers explained the diversity of the 5.9 GHz safety application ecosystem and the need to preserve the existing 75 MHz

allocation to leverage the full opportunity for existing and future safety benefits, emphasizing that all existing and planned applications are low-latency safety applications. We further highlighted the present assumption built into existing sharing proposals that all U-NII devices will be Wi-Fi devices, despite the fact that LTE in unlicensed spectrum ("LTE-U") and licensed assisted access ("LAA") devices operating in the U-NII bands could cause harmful interference to DSRC under the re-channelization proposal.

Please direct any questions to the undersigned.

Respectfully,

/s/ Scott Delacourt

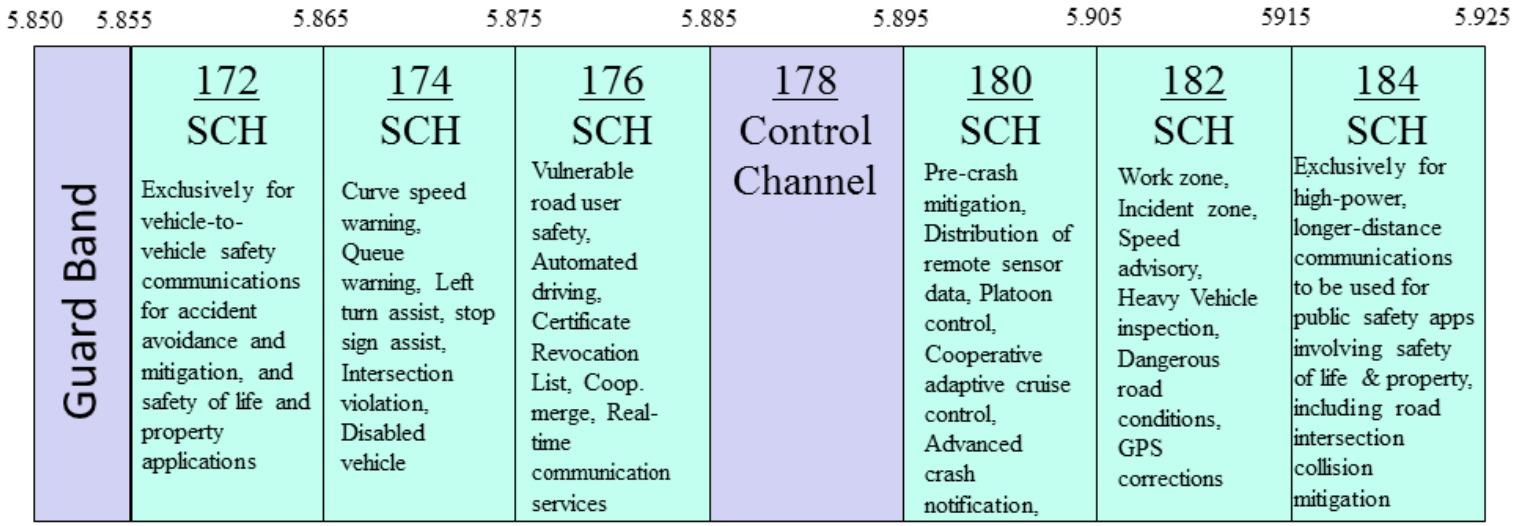
Scott D. Delacourt
Counsel to Global Automakers

Attachments

cc (via email): Erin McGrath
Julius Knapp
Geraldine Matise
Howard Griboff
Jamison Prime
Karen Rackley
Patrick Forster
Rashmi Doshi
Daudeline Meme

Critical DSRC Traffic

Illustrative DSRC Application-Channel Usage Map



This is illustrative. Actual channel use will vary with time and location for many applications. A given application may be offered on more than one channel.

The DSRC application channel usage plan has been structured, based on industry consensus, to support an extensive set of safety needs and is being finalized at the Society of Automotive Engineers ("SAE") as follows:

- CH 172: Primarily V2V safety
- CH 174: Primarily V2I safety and mobility.
- CH 176: Primarily V2P and security information, such as certificate revocation list ("CRL") distribution and update.
- CH 178: Control channel.
- CH 180: Primarily V2V safety, such as cooperative adaptive cruise control ("CACC") and platooning.
- CH 182: Primarily V2I safety, such as work zone speed and road condition advisories.
- CH 184: Primarily for high-power, longer-distance public safety.

January 25, 2017

The Honorable Ajit Pai, Chairman
The Honorable Mignon Clyburn, Commissioner
The Honorable Michael O'Rielly, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Pai, Commissioner Clyburn and Commissioner O'Rielly:

The American Trucking Associations, AAA, the Association of Global Automakers, the Intelligent Transportation Society of America, and the National Safety Council have joined together forming the Safety Spectrum Coalition to promote connected vehicle technology and protect the 5.9 GHz safety spectrum it relies on to save lives. As you know, on December 13th, the Department of Transportation (DOT) issued a Notice of Proposed Rulemaking (NPRM) to establish a rule requiring an interoperable standard for vehicle-to-vehicle (V2V) communications to provide secure and anonymous safety support for both conventional and automated passenger vehicles. The Safety Spectrum Coalition is encouraged by the release of the NPRM and looks forward to working with federal agencies and stakeholders to ensure that this technology is deployed on our roads as quickly as possible.

The proposed rule would create a new Federal Motor Vehicle Safety Standard requiring all light-duty vehicles produced after 2023, with a phase-in beginning 2021, to support V2V applications to mitigate and prevent vehicle crashes. The proposal contains performance requirements based on the unique characteristics of Dedicated Short Range Communications (DSRC) technology. Most importantly, the proposed V2V motor vehicle safety standard estimates that DSRC would save thousands of lives, avoid millions of injuries, and yield cost savings of as much as $270 billion.

This proposed rule represents the culmination of over a decade of work and investments by the federal government, state governments, research institutions, technical standards organizations, technology companies and automakers. Whereas in the past, progress was measured in small increments with improvements in vehicle crash survivability, the DSRC effort seeks to improve traffic safety by radically improving the capabilities of vehicles to coordinate movements to avoid crashes altogether. To achieve this goal, engineers have developed a robust, interoperable and secure communications protocol within DSRC to allow cars and trucks to transmit data directly from one vehicle to another at the rate of ten times per second. V2V technology also does not involve the exchange of information linked or linkable to an individual and has extensive privacy and security controls in place. V2V communications will create a standardized environment serving as the backdrop for a vehicle safety application ecosystem, unleashing

developers to innovate in furtherance of roadway safety. In addition, USDOT just released formal guidance to the states that addresses how public agencies may deploy DSRC to support Vehicle-to-Infrastructure communications to reduce injuries and fatalities, speed emergency services, and mitigate or eliminate congestion. The research and testing are done, and the results are in. The federal government is moving forward with this technology expeditiously in order to save lives.

As you know, there are safety-critical applications in development for all channels of the DSRC band. While V2V communications are a huge leap forward in safety, other applications, like commercial truck platooning, vehicle-to-infrastructure, vehicle-to-pedestrian communications, and DSRC support for automated driving are also critical to roadway safety. The NPRM and forthcoming final rule will provide the transportation industry, including original equipment manufacturers and aftermarket suppliers, with the standardization and certainty they need to increase deployments of this revolutionary technology.

Our Coalition fully supports the FCC spectrum sharing testing protocols to ensure no harmful interference throughout the band. However, we are opposed to the rechannelization of the band, and we do not believe testing the rechannelization option should hold up the implementation of DSRC or the DOT NPRM. We must continue to make safety of the traveling public a priority.

Sincerely,

Marshall Doney
President and CEO
AAA

Chris Spear
President and CEO
American Trucking Associations

John Bozzella
President and CEO
Association of Global Automakers

Regina Hopper
President and CEO
Intelligent Transportation Society of America

Deborah Hersman
President and CEO
National Safety Council